

EXHIBIT

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21-cv-00260-PB

CONFIDENTIAL

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UNITED STATES DISTRICT COURT
DISTRICT OF NEW HAMPSHIRE

SECURITIES AND EXCHANGE) Civil Action No.
COMMISSION,) 1:21-cv-00260-PB
)
Plaintiff,)
) VOLUME 1
vs.) (Pages 1 to 283)
)
LBRY, INC.,)
)
Defendant.)
_____)

CONFIDENTIAL VIDEOTAPED DEPOSITION OF
ALEX GRINTSVAYG
1155 AVENUE OF THE AMERICAS
NEW YORK, NEW YORK
THURSDAY, MARCH 17, 2022

REPORTED BY:
ELBIA BAIREZ
JOB NO. 220317LHR

CONFIDENTIAL

01:05 1 A. I'm guessing.

2 Q. Is it somewhere recorded on the
3 blockchain, the number of videos that LBRY is
4 hosting on its servers?

01:05 5 MR. DIXON: Objection as to form.

6 A. No.

7 Q. In terms of the -- not the number of
8 files, but the memory, is that something that --
9 total memory space of content that LBRY is

01:06 10 hosting on its servers, is that recorded
11 anywhere on the blockchain?

12 MR. DIXON: Objection as to form.

13 A. No.

14 MR. DIXON: Are we at a breaking
01:06 15 point for lunch? We're past 1:00.

16 MR. MOORES: Yeah. I just want to
17 finish up this document.

18 Q. So looking back at Exhibit number 93,
19 what is LBRY net hyphen EU?

01:06 20 A. It's the SDK. It's running in
21 Europe.

22 Q. Is that the same for LBRY net U.S.
23 east and U.S. west, it refers to the SDK that
24 LBRY is running in those locations?

01:06 25 A. Yes.

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01:06 1 Q. What is MoonPay?

2 A. MoonPay is a service that lets --

3 that -- it sends people LBC.

4 Q. And why is MoonPay listed here under

01:07 5 LBRY services?

6 A. It's a server that we run.

7 Q. Is the reflector here on Exhibit

8 number 93 referring to the reflector cylinder in

9 your diagram on Exhibit 91?

01:07 10 A. I think so.

11 Q. What is SPV 1?

12 A. It's a -- it's a wallet server --

13 Q. It's a wallet server as we talked

14 about on Exhibit number 92?

01:08 15 A. Yes.

16 Q. And are there six different wallet

17 servers that are all listed here on UptimeRobot?

18 A. Are there six different wallet

19 servers?

01:08 20 Q. Right.

21 So there's SPV 1, SPV 13, SPV 14, SPV

22 15, SPV 17 and SPV 18 all listed on UptimeRobot

23 on Exhibit number 93.

24 So are those all referring to wallet

01:08 25 servers?

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03:43 1 leadership team?

2 MR. DIXON: Objection as to form.

3 A. Maybe.

4 Q. Are you authorized to shut down an
03:43 5 application?

6 A. Yes.

7 Q. But it wasn't you who made the
8 decision to shut down LBRY TV?

9 A. I don't remember making that
03:43 10 decision.

11 Q. Who else is authorized at LBRY to
12 shut down any application?

13 A. It could be the leadership team. It
14 could be Jeremy. It could be Julian. Could be
03:44 15 someone else.

16 Q. Why was LBRY TV shut down?

17 A. It was replaced by Odysee.

18 Q. What is different between -- or what
19 was different at the time Odysee replaced it
03:44 20 between LBRY TV and Odysee?

21 A. The branding, the marketing.

22 Q. In terms of functionality, what was
23 different between LBRY TV and Odysee at the time
24 that Odysee replaced LBRY TV?

03:44 25 MR. DIXON: Objection as to form.

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06:10 1 Q. Who is Liam Cardenas?

2 A. He used to work for LBRY.

3 MR. MOORES: For the record,

4 C-A-R-D-E-N-A-S.

06:10 5 Q. Who is Travis Eden?

6 A. He used to work for LBRY.

7 Q. Who's Xander Luciano?

8 A. He used to work for Odysee.

9 Q. Who is Paul Webb?

06:10 10 A. He used to work for LBRY.

11 Q. Who is Anthony Mayfield?

12 A. I believe he works for LBRY -- for

13 Odysee.

14 Q. Who is Igor Gassmann?

06:10 15 A. He used to work for LBRY.

16 Q. Who is Zhu Dung Li (phonetic)?

17 A. I think that's Roy.

18 Q. And who is Johnny Nelson?

19 A. He works for Odysee.

06:11 20 Q. Have you ever participated in a LBRY

21 program by which you purchased LBC?

22 A. Yes.

23 Q. When did you first participate?

24 A. Sometime last year, I believe.

06:11 25 Q. In 2021?

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06:11 1 A. I believe so.

2 Q. Are you still participating in a

3 employee LBC purchase program?

4 A. Yes.

06:11 5 Q. And can you describe for me how that

6 program works?

7 A. Every month, LBRY takes \$50 out of my

8 paycheck and sends me \$50 worth of LBC.

9 Q. How was the price set?

06:12 10 A. I believe it's the market price.

11 Q. Do you know?

12 A. Um -- yes. I think that's it. Or

13 maybe there's some kind of discount or

14 something. I'm not sure.

06:12 15 Q. Did you sign any agreement when you

16 began the -- when you purchased -- first

17 purchased to get into the program?

18 A. I don't remember doing that.

19 Q. Sign off on anything --

06:12 20 A. I don't think so.

21 Q. -- to have them take money out of

22 your paycheck?

23 A. No, I don't think so. Like I can't

24 remember doing that.

06:12 25 Q. Did you at least orally agree to it?

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06:13 1 A. Yes.

2 Q. I mean, so have you ever heard of an

3 opt-in versus opt-out program?

4 A. Yes.

06:13 5 Q. Is the LBC employee purchase program

6 an opt-out program or opt-in program?

7 A. Opt-in.

8 Q. So you opted in?

9 A. Yes.

06:13 10 Q. Is there restriction on your usage of

11 the LBC?

12 A. Not that I know of.

13 Q. Are there requirements for how you

14 are to use the LBC?

06:13 15 A. Not that I know of.

16 Q. Why did you decide to participate in

17 the program?

18 A. I'm not sure.

19 Q. The program's been around for a few

06:13 20 years at least, right?

21 A. Yes.

22 Q. And why did you not participate

23 earlier?

24 A. I don't remember.

06:14 25 Q. How -- what have you done with the

CONFIDENTIAL

06:14 1 LBC that you have purchased in the LBC employee
2 purchase program?

3 A. Nothing.

4 Q. It sits in your digital wallet?

06:14 5 A. Yes.

6 Q. Why have you done nothing with it?

7 A. I don't know.

8 Q. Do you own LBC that you otherwise
9 acquired?

06:14 10 A. Yes.

11 Q. How did you acquire that LBC?

12 A. From LBRY.

13 Q. When did you acquire the LBC from
14 LBRY?

06:15 15 A. I don't remember.

16 Q. Did you pay for it?

17 A. No.

18 Q. LBRY just gave it to you?

19 A. Yes.

06:15 20 Q. Was it for all the hard work you've
21 been doing or like a bonus?

22 A. No.

23 Q. Was it a clerical error? You somehow
24 got it and they don't even know about it or --

06:15 25 A. No.

2/14/22, 3:43 PM

LBRY Services

LBRY Services

Service status

Some systems down



Services





2/14/22, 3:43 PM

LBRY Services

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